

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

JUSTIN BELL, et al.,	:	Civil Action No. 10-cv-00320-GLL
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
CITIZENS FINANCIAL GROUP, INC.,	:	
et al.,	:	
	:	
Defendants.	:	
	:	

VERDICT FORM

1. Have the ABMs met their burden of proving by a preponderance of the evidence that there were occasions on which each of them worked over 40 hours in a workweek?

Yes _____

No _____

IF YOU ANSWERED “NO” TO QUESTION 1, STOP. YOUR DELIBERATIONS ARE COMPLETE. THE FOREPERSON SHOULD SIGN THE FORM BELOW AND NOTIFY THE COURT OFFICER.

IF YOU ANSWERED “YES” TO QUESTION 1, PROCEED TO QUESTION 2.

2. Has Citizens met its burden of proving by a preponderance of the evidence that ABMs are managers and therefore are exempt from the federal overtime law under the Executive Exemption?

Yes ____

No ____

IF YOU ANSWERED “YES” TO QUESTION 2, STOP. YOUR DELIBERATIONS ARE COMPLETE. THE FOREPERSON SHOULD SIGN THE FORM BELOW AND NOTIFY THE COURT OFFICER.

IF YOU ANSWERED “NO” TO QUESTION 2, PROCEED TO QUESTION 3.

3. Has Citizens met its burden of proving by a preponderance of the evidence that ABMs are managers and therefore are exempt from the federal overtime law under the Administrative Exemption?

Yes _____

No _____

IF YOU ANSWERED “YES” TO QUESTION 3, STOP. YOUR DELIBERATIONS ARE COMPLETE. THE FOREPERSON SHOULD SIGN THE FORM BELOW AND NOTIFY THE COURT OFFICER.

IF YOU ANSWERED “NO” TO QUESTION 3, PROCEED TO QUESTION 4.

4. Did Citizens know that its treatment of ABMs as exempt was a violation of law, or act with reckless disregard of whether its treatment of ABMs violated the law?

Yes _____

No _____

YOUR DELIBERATIONS ARE COMPLETE. THE FOREPERSON SHOULD SIGN THE FORM BELOW AND NOTIFY THE COURT OFFICER.

Dated: _____

Foreperson

Respectfully submitted,

CITIZENS FINANCIAL GROUP, INC.
RBS CITIZENS, N.A.
CITIZENS BANK OF PENNSYLVANIA

By their attorneys,

PROSKAUER ROSE LLP

/s/Mark W. Batten

Elise M. Bloom*

Brian J. Gershengorn*

Proskauer

Eleven Times Square

New York, NY 10036

Tel: 212.969.3000; Fax: 212.969.2900

ebloom@proskauer.com

bgershengorn@proskauer.com

Mark W. Batten*

Alison Langlais*

Proskauer

One International Place

Boston, MA 02110

Tel: (617) 526-9600; Fax: (617) 526-9899

mbatten@proskauer.com

alanglais@proskauer.com

*Admitted pro hac vice

Dated: April 16, 2013

CERTIFICATE OF SERVICE

I hereby certify that on April 16, 2013, a true copy of the foregoing was filed through the Court's electronic filing system (ECF) and was served upon all attorneys of record for each other party to this action through operation of such system. It is available for viewing and downloading through the ECF system.

/s/ Mark W. Batten

Mark W. Batten